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June 4, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge  
United States District Court – District of NJ  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Court Room 7W  
Trenton, NJ 08608

**RE: In re: Johnson & Johnson Talcum Powder Products Marketing, Sales  
Practices and  
Products Liability Litigation – MDL 2738**

**This correspondence relates to: Sandra Kopp Prickett v. Johnson & Johnson, Case No. 3:19-cv-20353 and Roberta Lynn Smith v. Johnson & Johnson, Case No. 3:19-cv-20329**

Dear Honorable Rukhsanah L. Singh:

Plaintiffs respond to the Johnson & Johnson Defendants' letter [Docket No. 32601] asking why cases on their attached Exhibit A [Docket No. 32601-02] should not be dismissed with prejudice for an alleged failure to serve a Plaintiff Profile Form ("PPF") pursuant to the process stated in the Case Management Order dated February 13, 2024 [Docket NO. 29032].

Defendants identified Plaintiff Sandra Kopp Prickett and Plaintiff Roberta Lynn Smith as not having complied with the Court's order [See Docket No. 185004, Prickett page 28 of 41, row 1195 and Smith page 28 of 41, row 1194]. Plaintiffs both served a copy of their PPFs to Johnson & Johnson on 5/16/2024. A copy of the Registry for Sandra Kopp Prickett as it exists today is attached hereto as Exhibit 1. A copy of the Registry for Roberta Lynn Smith as it exists today is attached hereto as Exhibit 2. A copy of the Brown Greer submission report for Prickett and Smith is attached hereto as Exhibit 3.

Accordingly, Plaintiffs Sandra Kopp Prickett and Roberta Lynn Smith seek entry of an Order that (1) directs Johnson & Johnson to correct the Record in the docket concerning the Prickett and Smith cases, so as to avoid further prejudice; (2) instructs Johnson & Johnson to directly coordinate with Brown Greer for the purpose of updating and/or verifying Johnson & Johnson's own access to the MDL Centrality records including the portal's full and complete

content; (3) instructs Johnson & Johnson to meet and confer with the undersigned if its counsel contend that the Prickett and Smith submissions are not contained within the portal; and (4) whatever further relief this Court deems just and appropriate.

Respectfully submitted,

Dated: June 4, 2024

/s/ Michael B. Lynch  
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and

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2024, a copy of the foregoing document was filed via the Court's CM/ECF electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Michael B. Lynch  
Michael B. Lynch